

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Jacinto Reynoso

Debtor.

Deutsche Bank National Trust Company, as Trustee for  
Merrill Lynch Mortgage Investors Trust, Mortgage  
Loan Asset-Backed Certificates, Series 2005-AR1  
Movant,

vs.

Jacinto Reynoso,

Debtor / Respondents,

and

William C. Miller,,

Trustee / Respondent.

Chapter 13

Case No.: 17-10751-amc

**Hearing Date: February 20, 2018**

**Time: 11:00 am**

Location: Courtroom 5

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**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Deutsche Bank National Trust Company, as Trustee for Merrill Lynch Mortgage Investors Trust, Mortgage Loan Asset-Backed Certificates, Series 2005-AR1 has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court for leave to enforce its rights as determined by state and/or other applicable law with regard to real property.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **February 13, 2018**, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court  
Eastern District of Pennsylvania  
900 Market Street, Suite 400  
Philadelphia, PA 19107

(b) mail a copy to the Movant's attorney:

Matthew C. Waldt, Esquire  
Milstead & Associates, LLC  
1 East Stow Road  
Marlton, NJ 08053  
Phone No.: 856-482-1400  
Fax No.: 856-482-9190

(c) mail a copy to the Chapter 13 Trustee:

WILLIAM C. MILLER, Esq.  
Chapter 13 Trustee  
P.O. Box 1229  
Philadelphia, PA 19105

2. If you or your attorney do not take the steps described in paragraphs 1(a), 1(b) and 1(c) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashley M. Chan on **February 20, 2018 at 11:00 am** in Courtroom 5, Robert C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer to the Motion.

Respectfully submitted,  
MILSTEAD & ASSOCIATES, LLC

DATED: January 23, 2018

/s/Matthew C. Waldt  
Matthew C. Waldt, Esquire  
Attorney ID No. 203308  
[mwaldt@milsteadlaw.com](mailto:mwaldt@milsteadlaw.com)  
1 East Stow Road  
Marlton, NJ 08053  
Attorneys for Movant